EXHIBIT A

June 10, 2025

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Via Electronic Mail

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Re: *United States v. Roman Storm*, 23 Cr. 430 (KPF) (S.D.N.Y.)

Dear Counsel:

We were surprised to see your recently filed motion *in limine* seeking to introduce certain records pursuant to Federal Rule of Evidence 902(11). (Dkt. 157 at 13 (the "Authentication MIL")). We write again to request specific identification of the records that you seek to admit so that we can consider stipulations, as well as consider our position in response to your motion. On the current record, neither us nor the Court have sufficient information as to many of these types of records to consider whether they are admissible under Rule 902(11), *i.e.*, whether they meet the requirements of Rule 803(6)(A)-(3), which require that the records be made at or near the time by someone with knowledge, kept in the course of a regularly conducted activity, and the making of which was a regular practice. Indeed, as to some records, we do not have information even to determine whether they are authentic under Rule 901, because we do not know what they purport to be. This is true for various native files and unidentified .csv or .xls documents, as described below. To the extent they purport to be records of regularly conducted business activity, it must at least be clear what activity they apparently reflect.

Prior to the original date for filing motions i*n limine*, on October 21, 2024, you asked us to meet and confer on a potential records request. On October 25, 2024, we met and conferred on several pretrial issues, including your records request. At the time, the government indicated that the custodians included: Alchemy, Infura (Consensys), Piñata, Rho Technologies, Mercury Bank (Evolve Trust & Bank), X (Twitter), GitHub, Amazon Web Services, and Google. While we noted that we likely could eventually reach stipulations on many of these types of documents, we noted that the identified custodians have produced voluminous documents and requested clarification on the precise records the government seeks to authenticate through a stipulation. You indicated you would follow up with specifics, but we do not believe we ever received any correspondence on that issue.

To consider your request that documents be admitted under Rule 902(11), we need answers to the following questions:

Alchemy. Documents produced with the Bates numbers USAO_0031094–USAO_31097 are slipsheets indicating that these documents have been produced as native files. We could not locate any other files bearing these Bates numbers, but we note that USAO_0031098–USAO_0031101 are Excel files also produced by Alchemy. Please confirm that the native files referenced in USAO_0031094–USAO_31097 were produced as USAO_0031098–USAO_0031101. Further, to the extent you seek authentication of the Excel files produced as USAO_0031098–USAO_0031101, please provide an explanation of what these records purport to be.

Infura (Consensys). Among the various production files attributed to Infura (Consensys) are several large .csv files produced as USAO_00026952; USAO_SDNY_04497837; USAO_0031239; USAO_SDNY_00454657; USAO_SDNY_00454661; USAO_SDNY_00454662; and USAO_SDNY_00454667. To the extent you seek authentication of these .csv files, please provide an explanation of what these records purport to be.

Piñata. The production files attributed to Piñata consist of approximately 20,000 documents in various file formats, many of which appear to be JavaScript (.js), .svg, .css, and other files that we are unable to access. To the extent you seek authentication of these .csv files, please provide an explanation of what these records purport to be and how they are meant to be viewed or accessed.

In addition to the records about which we previously met and conferred, your motion *in limine* also seeks to authenticate the records of **BitMart** and the **Ronin Network**. Please identify, by Bates number, which records the government seeks to authenticate and, to the extent they include voluminous .csv or other files, please provide an explanation of what such records purport to be.

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Please let us know by Thursday, June 12, 2025, so we can consider the government's requests in connection with its Authentication MIL and to facilitate a potential stipulation. We look forward to hearing from you.

Sincerely,

/s/ Keri Curtis Axel

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